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May 1, 2003

RECEIVED  
MAY 01 2003  
Federal Communications Commission  
Office of Secretary

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: E911 Quarterly Report  
Rural Cellular Corporation for itself and its affiliates

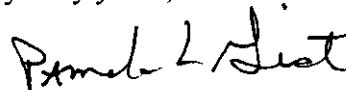
Dear Ms. Dortch:

On behalf of Rural Cellular Corporation and its subsidiaries<sup>1</sup> (collectively, "RCC") this letter is submitted to report the status of the company's implementation of E911 services.

RCC is a digital wireless carrier operating cellular radiotelephone and/or personal communications services in multiple markets. RCC is a Tier II carrier as defined in *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 2002 FCC LEXIS 3638, FCC 02-210 (2002) ("Phase II Stay Order"). This report is submitted in compliance with the terms of the *Phase II Stay Order*.

Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,



Pamela L. Gist

<sup>1/</sup> This report pertains to the following companies which are wholly-owned subsidiaries of Rural Cellular Corporation and are authorized by the FCC to provide broadband Commercial Mobile Radio Service: RCC Atlantic, Inc., RCC Holdings, Inc., RCC Minnesota, Inc., Wireless Alliance, LLC and TLA Spectrum, L.L.C.

# **Rural Cellular Corp. E911 Implementation Report**

## **Summary**

Rural Cellular Corporation ("Rural Cellular") continues to diligently fulfill the numerous Phase 1 and Phase 2, wireless E911 requests that have been received. In general, the Phase 1 requests continue to be completed with minor difficulties, typically in the form of database, network or PSAP issues. In the past quarter, Rural Cellular has made substantial progress regarding our Phase 2 deployment; however, we continue to be concerned about the realistic accuracy that a rural network-based solution can provide.

The deployment of wireless location services has been a fluid process for Rural Cellular, as we attempt to embrace these services in the rapidly changing wireless landscape. Rural Cellular has migrated from a plan to deploy handset solutions early last year, to the actual deployment of a network-based solution in three states in early 2003. The lack of TDMA handsets with GPS functionality for Rural Cellular's predominately TDMA networks has compelled our decision to deploy a network-based solution. Although we are relatively comfortable that we can meet the first 50% benchmark for Phase 2, it now appears unrealistic that we can achieve 100% Phase 2 compliance in our rural areas with the network-based technology.

Unlike many Tier 1 and Tier 2 carriers that have chosen a network-based solution, Rural Cellular's markets do not have the population density to allow the averaging of our RSA's with MSA accuracy results to achieve the mandated accuracy. In light of these circumstances, Rural Cellular is faced with a daunting decision: continue to deploy a network-based solution for Phase 2, knowing that full compliance is not likely to be achieved or migrate to a handset-based solution. The handset-based solution would involve a complete overlay or conversion of our TDMA networks to CDMA technology, or possibly GSM should a GSM/aGPS handset become available. This network migration would place an unreasonable burden in terms of capital investment given the timeline for compliance set forth for GPS handset sales and replacement.

With these challenges in mind, Rural Cellular encourages the FCC to consider either relaxed accuracy standards for rural areas and/or extended timelines for TDMA carriers to migrate to CDMA/aGPS capable networks. In spite of these challenges, Rural Cellular will continue in our good faith efforts to meet our Phase 2 responsibilities.

## **Network Based Solution:**

As mentioned, Rural Cellular is deploying a network-based solution, provided by Grayson Wireless, which utilizes a complex triangulation method to approximate the location of a 911-wireless caller. Grayson requires the installation of additional equipment, power and data circuits at each cell to gather data from the call. In general,

most sites will utilize the Time Difference of Arrival (TDOA) data to determine the handset's location. However Grayson has recommended large and cumbersome Angle of Arrival (AOA) antennas at many of our sites where there is no third point of reference for the triangulation calculation. These AOA antennas provide the angle of the signal that is transmitted by the handset, providing the critical third reference point. After substantial review of Rural Cellular's cell sites and tower locations numerous challenges have surfaced in our attempts to deploy these AOA antennas. In many instances the tower will not support the additional weight of the AOA antennas and the necessary cables to connect to the antennas. In some cases the installation of AOA antennas would be delayed or blocked by state environmental review or local zoning boards. For example, recently in Vermont a request to add one antenna to an existing cell site was delayed for over three years due to local zoning battles. These additional obstacles result in a substantial financial and regulatory burden on Rural Cellular in our attempts to comply with the mandate. Rural Cellular has installed Grayson equipment in all of the states where we have Phase 2 requests. The accuracy data compiled in these states will determine the long-term viability of a network-based solution in Rural Cellular's non-urban markets.

### **Status of Phase 1 Requests:**

**Vermont:** Rural Cellular has completed the Phase I requirements in the state of Vermont.

**Maine:** Rural Cellular is working with the state of Maine on their first Phase I, wireless E911 trial. The Phase I trial is being conducted in the County of Lincoln, and is being coordinated by the state's Emergency Services Communications Bureau. Testing is currently underway and we hope to turn the system up by May 11, 2003.

**Minnesota:** Rural Cellular has been actively working to complete our Phase I deployments in Minnesota. At this point many of the counties have been completed and tested. We have turned up several counties since our last filing. In most cases, the remaining counties have not been completed due to delays in the cell site addressing and call routing instruction process. Rural Cellular, in conjunction with our database provider, Intrado, has provided the appropriate information to the state for cell site addressing and routing instructions. The state then forwards this information to the counties for "official addressing and routing"; unfortunately, due to limited resources the process in several counties has been delayed. In three other counties Rural Cellular has a partnership with T-Mobile where network elements are shared. This relationship has complicated the deployment process due to routing issues. At this point the process is moving forward and we hope to complete Phase I deployment in the near future. In the case of Stearns County, Rural Cellular's network supports AT&T wireless customers and we are working through routing issues to bring the Phase I services online. In all of these instances, Rural Cellular is confident that progress is being made and we hope to complete all Phase I requests in the state of Minnesota in the near future.

**Alabama:** At this point most of the counties in Alabama that requested Phase I services have been tested and are in service. In the remaining counties, Rural Cellular is waiting for resolution of either the database addressing problems, and challenges with the local telephone company and/or PSAP. In Fayette and Lamar counties, confusion related to the ALI database connection delayed the Phase I deployment. These issues have been resolved and we hope to deploy both counties in the next few days. We will be re-testing Talladega county in the near future, and we are awaiting a connection to the standalone ALIs at the Covington and Coffee Cty/Enterprise PSAPs in order to proceed with their Phase I deployment. Rural Cellular expects these remaining issues to be resolved allowing the full Phase I deployment to be completed within the coming months.

**Oregon:** Rural Cellular has completed the deployment of Phase I in all of our Oregon service areas that have requested Phase I service.

**Washington:** Rural Cellular has received Phase I service requests from several counties in the state of Washington. The necessary circuits to the selective routers have been ordered and we expect their installation in the near future. At that point we can complete deployment of Phase I service in the state of Washington.

**Massachusetts:** Rural Cellular has received a Phase I request for the commonwealth of Massachusetts. We did experience some delays in the acceptance process of our trunking proposal that was submitted to the ILEC. That plan has now been accepted and we are proceeding toward implementation.

**Mississippi:** Rural Cellular has received several requests for Phase I service from counties in the state of Mississippi. We have experienced some delays as we try to determine the preferred database, trunking and call routing plan. We are working with the PSAPs to resolve these issues and complete Phase I deployment.

**Kansas:** Rural Cellular has not received a Phase I request from the State of Kansas.

**New York:** Rural Cellular has received a Phase I request from Clinton County and we have issued trunking orders to start the Phase I implementation process.

**Wisconsin:** Rural Cellular has not received a Phase I request from the State of Wisconsin.

**South Dakota:** Rural Cellular has not received a Phase I request from the State of South Dakota.

**North Dakota:** Rural Cellular has not received a Phase I request from the State of North Dakota.

## **Status of Phase 2 Requests**

**Minnesota:** Rural Cellular has received a request from the state of Minnesota's 911 administrator to provide Phase 2 services. Rural Cellular has two networks operating in the state of Minnesota, one a TDMA network, and the second a GSM network. Rural Cellular has deployed a Grayson network-based solution in our TDMA markets and we are coordinating testing/cutover with the state. We are finalizing the Grayson deployment in our GSM markets and hope to bring those areas on-line as soon as possible. As discussed previously Rural Cellular has not deployed the AOA antennas in the initial part of our Phase 2 deployment. Due to the difficulty in deploying the AOA antennas, Rural Cellular will postpone their deployment until a future date. Preliminary computer models of the accuracy without the AOA antennas indicate that we may fall short of the accuracy required. Rural Cellular is proceeding with our deployment with the TDOA only network with the hope that we can achieve the necessary accuracy for 50% of our market. Rural Cellular desires to resolve all of the outstanding Phase I issues in Minnesota before we fully deploy the Phase 2 network. We are confident that these issues will be resolved and the Phase 2 services can be implemented.

**Vermont:** Rural Cellular has fully deployed the Grayson equipment to meet the first benchmark of 50% for Phase 2 compliance in the state of Vermont. We have turned up Phase 2 services in the greater Chittenden county area and hope to turn the entire system up in the next few weeks. Due to the sparse cell site placement and rugged terrain in Vermont, our vendor has recommended the deployment of AOA antennas. The AOA antennas present a difficult challenge in Vermont due to the lengthy zoning and permit process required to modify cell sites. At this point our vendor has confirmed that in the absence of AOA antennas it is unlikely that we will meet the 100% Phase 2 accuracy threshold. Rural Cellular has presented this limitation to the Vermont Enhanced Emergency 911 Board and we will be working to improve the accuracy to the best of our abilities.

**Alabama:** Rural Cellular has received two requests for Phase 2 services from Alabama counties within our service area. Rural Cellular has deployed the Grayson equipment on the few cell sites that we have in the area. We are currently working with the county to resolve the database connectivity issues to bring Phase I service online. As soon as Phase I is deployed we will implement our Phase 2 solution. Once again we are concerned about the accuracy that is reasonably attainable in our rural areas with the network-based technology.

**RURAL CELLULAR CORPORATION**  
**E911 Phase I Requests Activated**

Region	State	Requesting Entity Name	PSAP	Date requested	Valid PSAP Request	Date E911 Phase I Active	Reason if not	Projected Deployment Date
AL	Bibb	Bibb	Bibb	6/26/00	Yes	12/5/02		
AL	Butler	Butler	Butler	10/10/00	Yes	3/30/03		
AL	Calhoun	Calhoun	Calhoun	No Phase I request		10/31/02		
AL	Chambers	Chambers	Chambers	7/18/00	Yes	10/30/02		
AL	Chilton	Chilton	Chilton	12/13/00	Yes	1/17/03		
AL	Choctaw	Choctaw	Choctaw	6/28/99	Yes	1/17/03		
AL	Clay	Clay	Clay	7/20/00	Yes	1/17/03		
AL	Cleburne	Cleburne	Cleburne	2/25/00	Yes	10/31/02		
AL	Coffee - County	Coffee	Coffee	2/2/01	Yes	4/10/03		
AL	Coffee - Enterprise	Enterprise	Enterprise	2/2/01	Yes		Waiting for sALI connections	06/01/03
AL	Coosa	Coosa	Coosa	No Phase I request				
AL	Covington	Covington	Covington	10/30/00	Yes		Waiting for sALI connections	06/01/03
AL	Crenshaw	Crenshaw	Crenshaw	2/2/01	Yes	3/20/03		
AL	Dallas	Dallas	Dallas	11/3/99	Yes	12/5/02		
AL	Fayette	Fayette	Fayette	11/17/99	Yes		Testing/cutover on 5/1/03	05/02/03
AL	Geneva County	Geneva County	Geneva County	10/17/00	Yes	4/10/03		
AL	Greene	N/A	N/A	No Phase I request		1/17/03		
AL	Hale	Hale	Hale	5/11/99	Yes	1/17/03		
AL	Lamar	Lamar	Lamar	11/15/00	Yes	4/30/03		
AL	Lowndes	Lowndes	Lowndes	1/25/01	Yes	1/24/03		
AL	Marengo	Marengo	Marengo	8/14/00	Yes	1/17/03		
AL	Perry	N/A	N/A	No Phase I request		N/A		
AL	Pickens	Pickens	Pickens	7/17/00	Yes	1/17/03		
AL	Pike	Pike	Pike	No Phase I request				
AL	Randolph	Randolph	Randolph	3/1/01	Yes	1/17/03		
AL	Sumter	Sumter	Sumter	8/14/00	Yes	1/17/03		
AL	Talladega	Talladega	Talladega	7/9/99	Yes		Re-testing/cutover imminent	06/01/03
AL	Tallapoosa	Tallapoosa	Tallapoosa	9/1/99	Yes	10/31/02		
AL	Wilcox	Wilcox	Wilcox	7/19/00	Yes	1/17/03		
KS	Cheyenne			No Phase I requests				
KS	Rawlins			No Phase I requests				
KS	Decatur			No Phase I requests				
KS	Sherman			No Phase I requests				
KS	Thomas			No Phase I requests				
KS	Sheridan			No Phase I requests				
KS	Norton			No Phase I requests				
KS	Phillips			No Phase I requests				
KS	Smith			No Phase I requests				
KS	Graham			No Phase I requests				
KS	Rooks			No Phase I requests				
KS	Osborne			No Phase I requests				

Region	State	Requesting Entity Name	PSAP	Date requested	Valid PSAP Request	Date E911 Phase I Active	Reason If not	Projected Deployment Date
	KS	Wallace		No Phase I requests				
	KS	Greely		No Phase I requests				
	KS	Logan		No Phase I requests				
	KS	Gove		No Phase I requests				
	KS	Wichita		No Phase I requests				
	KS	Scott		No Phase I requests				
	KS	Lane		No Phase I requests				
	KS	Trego		No Phase I requests				
	KS	Ellis		No Phase I requests				
	KS	Russell		No Phase I requests				
	KS	Ness		No Phase I requests				
	KS	Rush		No Phase I requests				
	KS	Barton		No Phase I requests				
	KS	Pawnee		No Phase I requests				
	KS	Hamilton		No Phase I requests				
	KS	Kearny		No Phase I requests				
	KS	Finney		No Phase I requests				
	KS	Stanton		No Phase I requests				
	KS	Grant		No Phase I requests				
	KS	Haskell		No Phase I requests				
	KS	Morton		No Phase I requests				
	KS	Stevens		No Phase I requests				
	KS	Seward		No Phase I requests				
	KS	Hodgeman		No Phase I requests				
	KS	Gray		No Phase I requests				
	KS	Ford		No Phase I requests				
	KS	Meade		No Phase I requests				
	KS	Clark		No Phase I requests				
	KS	Edwards		No Phase I requests				
	KS	Stafford		No Phase I requests				
	KS	Kiowa		No Phase I requests				
	KS	Pratt		No Phase I requests				
	KS	Comanche		No Phase I requests				
	KS	Barber		No Phase I requests				
	MA	Franklin	State of MA	10/28/02	Yes		Awaiting circuits installations	06/01/03
	ME	Aroostook		No Phase I requests				
	ME	Piscataquis		No Phase I requests				
	ME	Somerset		No Phase I requests				
	ME	Penobscot		No Phase I requests				
	ME	Waldo		No Phase I requests				
	ME	Knox		No Phase I requests				
	ME	Lincoln	State Phase I Beta Test	No Phase I requests				05/06/03
	ME	Kennebec		No Phase I requests				

Region	State	Requesting Entity Name	PSAP	Date requested	Valid PSAP Request	Date E911 Phase I Active	Reason if not	Projected Deployment Date
	ME	Sagadahoc		No Phase I requests				
	ME	Cumberland		No Phase I requests				
	ME	York		No Phase I requests				
	ME	Oxford		No Phase I requests				
	ME	Franklin		No Phase I requests				
	MN	Aitkin	Aitkin	2/1/01	Yes	4/9/03		
	MN	Becker	Becker	2/1/01	Yes	5/29/03		
	MN	Beltrami	Beltrami	2/1/01	Yes		Awaiting routing and addressing information	07/01/03
	MN	Big Stone	Big Stone	2/1/01	Yes	3/29/02		
	MN	Carlton	Carlton	2/1/01	Yes	6/4/02		
	MN	Cass	Cass	2/1/01	Yes	3/29/02		
	MN	Clearwater	Clearwater	2/1/01	Yes	1/17/03		
	MN	Crow Wing	Crow Wing	2/1/01	Yes		Awaiting routing and addressing information	07/01/03
	MN	Douglas	Douglas	2/1/01	Yes	3/1/03		
	MN	Grant	Grant	2/1/01	Yes	4/19/02		
	MN	Hubbard	Hubbard	2/1/01	Yes		Awaiting routing and addressing information	07/01/03
	MN	Isanti	Isanti	2/1/01	Yes	3/26/03		
	MN	Itasca	Itasca	2/1/01	Yes	3/27/02		
	MN	Kanabec	Kanabec	2/1/01	Yes	4/5/02		
	MN	Kittson	Kittson	2/1/01	Yes	4/3/02		
	MN	Koochiching	Koochiching	2/1/01	Yes	4/11/02		
	MN	Lake of the Woods	Lake of the Woods	2/1/01	Yes	4/12/02		
	MN	Mahnomen	Mahnomen	2/1/01	Yes		Awaiting routing and addressing information	07/01/03
	MN	Marshall	Marshall	2/1/01	Yes	4/3/02		
	MN	Mille Lacs	Mille Lacs	2/1/01	Yes		Awaiting routing and addressing information	07/01/03
	MN	Morrison	Morrison	2/1/01	Yes		Awaiting routing and addressing information	07/01/03
	MN	Norman	Norman	2/1/01	Yes		Awaiting routing and addressing information	07/01/03
	MN	Otter Tail	Otter Tail	2/1/01	Yes	4/12/02		
	MN	Pennington	Pennington	2/1/01	Yes	5/10/02		
	MN	Pine	Pine	2/1/01	Yes	4/23/02		
	MN	Pope	Pope	2/1/01	Yes	11/6/02		
	MN	Red Lake	Red Lake	2/1/01	Yes	5/10/02		
	MN	Roseau	Roseau	2/1/01	Yes	5/4/02		
	MN	Stevens	Stevens	2/1/01	Yes	11/6/02		
	MN	Swift	Swift	2/1/01	Yes	3/27/02		
	MN	Todd	Todd	2/1/01	Yes	3/15/03		
	MN	Traverse	Traverse	2/1/01	Yes		Awaiting routing and addressing information	07/01/03
	MN	Wadena	Wadena	2/1/01	Yes	4/3/02		
	MN	Wilken	Wilken	2/1/01	Yes		Awaiting routing and addressing information	07/01/03
	MN	St. Louis	St. Louis	2/1/01	Yes		Coordinating routing with T-mobile	NA
	MN	Clay	Clay	2/1/01	Yes		Coordinating routing with T-mobile	NA
	MN	Polk	Polk	2/1/01	Yes		Coordinating routing with T-mobile	NA
	MN	Stearns	Stearns	2/1/01	Yes		Coordinating with AT&T	NA



Region	State	Requesting Entity Name	PSAP	Date requested	Request	Active	Reason if not	Date	Projected Deployment
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MS	Tunica			No request					
MS	Tate			No request					
MS	Marshall		Marshall	10/23/02	Yes		Waiting on Database Vendor	07/01/03	
MS	Coahoma		Coahoma	No request					
MS	Quitman		Quitman	No request					
MS	Panola		Panola	10/22/02	Yes		Waiting on Database Vendor	07/01/03	
MS	Lafayette		Lafayette	No request					
MS	Bolivar		Bolivar	No request					
MS	Sunflower		Sunflower	No request					
MS	Tallahatchie		Tallahatchie	No request					
MS	LeFlore		LeFlore	10/17/02	Yes		Waiting on Database Vendor	07/01/03	
MS	Carroll		Carroll	No request					
MS	Holmes		Holmes	No request					
MS	Yalobusha		Yalobusha	4/1/03	Yes		Waiting on Database Vendor	10/01/03	
MS	Grenada		Grenada	No request					
MS	Calhoun		Calhoun	No request					
MS	Chickasaw		Chickasaw	No request					
MS	Monroe		Monroe	No request					
MS	Clay		Clay	No request					
ND	Cass			No Phase I requests for ND					
ND	Trail			No Phase I requests for ND					
ND	Grand Forks			No Phase I requests for ND					
NH	Belknap			2/1/03	Yes			08/01/03	
NH	Carroll			2/1/03	Yes			08/01/03	
NH	Cheshire			2/1/03	Yes			08/01/03	
NH	Coos			2/1/03	Yes			08/01/03	
NH	Grafton			2/1/03	Yes			08/01/03	
NH	Hillsborough			2/1/03	Yes			08/01/03	
NH	Merrimack			2/1/03	Yes			08/01/03	
NH	Stafford			2/1/03	Yes			08/01/03	
NH	Sullivan			2/1/03	Yes			08/01/03	
NY	Clinton			4/14/03				08/01/03	
NY	Essex			No request					
NY	Franklin			No request					
NY	Fulton			No request					
NY	Hamilton			No request					
OR	Baker Co SO		Baker Co SO	Prior to April 2000	Yes		4/10/03		
OR	Benton		Benton	No request			5/23/03		
OR	Corvallis Regional Comm Ctr - Benton Co		Corvallis Regional Comm Ctr - Benton Co	Prior to April 2000	Yes		5/23/02		
OR	Crook		Crook	No request			1/23/03		
OR	Deschutes		Deschutes	Prior to April 2000	Yes				

Region	State	Requesting Entity Name	PSAP	Date requested	Valid PSAP Request	Date E911 Phase I Active	Reason If not	Projected Deployment Date
OR	Grant		Grant	No request				
OR	Harney		Harney	Prior to April 2000			Awaiting PSAP Upgrade	
OR	Hermiston PD		Hermiston PD	Prior to April 2000	Yes	2/6/03		
OR	Klamath		Klamath	Prior to April 2000	Yes	8/29/02		
OR	Lake		Lake	No request			Awaiting PSAP Upgrade	
OR	Lincoln		Lincoln	Prior to April 2000	Yes	8/14/02		
OR	Linn County Sheriffs Office		Linn County Sheriffs Office	Prior to April 2000	Yes	5/23/02		
OR	Malhuer		Malhuer	No request				
OR	Toledo PD		Toledo PD	Prior to April 2000	Yes	8/14/02		
OR	Umatilla Co SO		Umatilla Co SO	Prior to April 2000	Yes	4/10/03		
OR	Union		Union	No request				
OR	Walowa		Walowa	No request				
SD	Clark			No Phase 1 requests for SD				
SD	Codington			No Phase 1 requests for SD				
SD	Day			No Phase 1 requests for SD				
SD	Deuel			No Phase 1 requests for SD				
SD	Grant			No Phase 1 requests for SD				
SD	Hamlin			No Phase 1 requests for SD				
SD	Lincoln			No Phase 1 requests for SD				
SD	Marshall			No Phase 1 requests for SD				
SD	Minnehaha			No Phase 1 requests for SD				
SD	Roberts			No Phase 1 requests for SD				
VT	Vermont State Enhanced 911 Board		Vermont State E911 System		Yes	10/11/02		
WA	Asotin			12/2/02	Yes		Awaiting trunking and database circuits	06/02/03
WA	Chelan			12/12/02	Yes		Awaiting trunking and database circuits	06/02/03
WA	Columbia			11/4/02	Yes		Awaiting trunking and database circuits	06/02/03
WA	Douglas			10/24/02	Yes		Awaiting trunking and database circuits	06/02/03
WA	Ferry			12/2/02	Yes		Awaiting trunking and database circuits	06/02/03
WA	Garfield			10/25/02	Yes		Awaiting trunking and database circuits	06/02/03
WA	Okanogan			10/31/02	Yes		Awaiting trunking and database circuits	06/02/03
WA	Pend Oreille			11/8/02	Yes		Awaiting trunking and database circuits	06/02/03
WA	Stevens			12/10/02	Yes		Awaiting trunking and database circuits	06/02/03
WA	Walla Walla			9/11/02	Yes		Awaiting trunking and database circuits	06/02/03
WA	Whitman			4/24/02	Yes		Awaiting trunking and database circuits	06/02/03
WI	Douglas County			No Phase 1 requests for WI				

**RURAL CELLULAR CORPORATION**  
**E911 Phase II Requests Activated**

State	Requesting Entity Name	PSAP	Date requested	Valid PSAP Request	Date E911 Phase II Active	Reason if not	Projected Deployment Date
AL	Bibb	Bibb	Not Requested				
AL	Butler	Butler	Not Requested				
AL	Calhoun	Calhoun	Not Requested				
AL	Chambers	Chambers	Not Requested				
AL	Chilton	Chilton	Not Requested				
AL	Choctaw	Choctaw	Not Requested				
AL	Clay	Clay	Not Requested				
AL	Cleburne	Cleburne	Not Requested				
AL	Coffee - County	Coffee	Not Requested				
AL	Coffee - Enterprise	Enterprise	Not Requested				
AL	Coosa	Coosa	Not Requested				
AL	Covington	Covington	Not Requested				
AL	Crenshaw	Crenshaw	Not Requested				
AL	Dallas	Dallas	Not Requested				
AL	Fayette	Fayette	12/2/02	Yes		System installed, deployment in progress	6/2/03
AL	Geneva County	Geneva County	Not Requested				
AL	Greene	Greene	Not Requested				
AL	Hale	Hale	Not Requested				
AL	Lamar	Lamar	9/27/02	Yes		System installed, deployment in progress	6/2/03
AL	Lowndes	Lowndes	Not Requested				
AL	Marengo	Marengo	Not Requested				
AL	Perry	Perry	Not Requested				
AL	Pickens	Pickens	Not Requested				
AL	Pike	Pike	Not Requested				
AL	Randolph	Randolph	Not Requested				
AL	Sumter	Sumter	Not Requested				
AL	Talladega	Talladega	Not Requested				
AL	Tallapoosa	Tallapoosa	Not Requested				
AL	Wilcox	Wilcox	Not Requested				
KS	Cheyenne		No Phase 2 requests for KS				
KS	Rawlins		No Phase 2 requests for KS				
KS	Decatur		No Phase 2 requests for KS				
KS	Sherman		No Phase 2 requests for KS				
KS	Thomas		No Phase 2 requests for KS				
KS	Sheridan		No Phase 2 requests for KS				
KS	Norton		No Phase 2 requests for KS				
KS	Phillips		No Phase 2 requests for KS				
KS	Smith		No Phase 2 requests for KS				
KS	Graham		No Phase 2 requests for KS				
KS	Rooks		No Phase 2 requests for KS				

State	Requesting Entity Name	PSAP	Date requested	Valid PSAP Request	Active	Reason if not	Projected Deployment Date
KS	Osborne		No Phase 2 requests for KS				
KS	Wallace		No Phase 2 requests for KS				
KS	Greely		No Phase 2 requests for KS				
KS	Logan		No Phase 2 requests for KS				
KS	Grove		No Phase 2 requests for KS				
KS	Wichita		No Phase 2 requests for KS				
KS	Scott		No Phase 2 requests for KS				
KS	Lane		No Phase 2 requests for KS				
KS	Trego		No Phase 2 requests for KS				
KS	Ellis		No Phase 2 requests for KS				
KS	Russell		No Phase 2 requests for KS				
KS	Ness		No Phase 2 requests for KS				
KS	Rush		No Phase 2 requests for KS				
KS	Barton		No Phase 2 requests for KS				
KS	Pawnee		No Phase 2 requests for KS				
KS	Hamilton		No Phase 2 requests for KS				
KS	Kearny		No Phase 2 requests for KS				
KS	Finney		No Phase 2 requests for KS				
KS	Stanton		No Phase 2 requests for KS				
KS	Grant		No Phase 2 requests for KS				
KS	Haskell		No Phase 2 requests for KS				
KS	Morton		No Phase 2 requests for KS				
KS	Stevens		No Phase 2 requests for KS				
KS	Seward		No Phase 2 requests for KS				
KS	Hodgeman		No Phase 2 requests for KS				
KS	Gray		No Phase 2 requests for KS				
KS	Ford		No Phase 2 requests for KS				
KS	Meade		No Phase 2 requests for KS				
KS	Clark		No Phase 2 requests for KS				
KS	Edwards		No Phase 2 requests for KS				
KS	Stafford		No Phase 2 requests for KS				
KS	Kiowa		No Phase 2 requests for KS				
KS	Prairie		No Phase 2 requests for KS				
KS	Comanche		No Phase 2 requests for KS				
KS	Barber		No Phase 2 requests for KS				
MA	Franklin		No Phase 2 requests for MA				
ME	Aroostook		No Phase 2 requests for ME				
ME	Piscataquis		No Phase 2 requests for ME				
ME	Somerset		No Phase 2 requests for ME				
ME	Penobscot		No Phase 2 requests for ME				
ME	Waldo		No Phase 2 requests for ME				
ME	Knox		No Phase 2 requests for ME				

State	Requesting Entity Name	PSAP	Date requested	Valid PSAP Request	Date E911 Phase II		Projected Deployment Date
					Active	Reason if not	
ME	Lincoln		No Phase 2 requests for ME				
ME	Kennebec		No Phase 2 requests for ME				
ME	Sagadahoc		No Phase 2 requests for ME				
ME	Cumberland		No Phase 2 requests for ME				
ME	York		No Phase 2 requests for ME				
ME	Oxford		No Phase 2 requests for ME				
ME	Franklin		No Phase 2 requests for ME				
MN	Aitkin	Aitkin	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Becker	Becker	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Beltrami	Beltrami	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Big Stone	Big Stone	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Carlton	Carlton	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Cass	Cass	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Clearwater	Clearwater	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Crow Wing	Crow Wing	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Douglas	Douglas	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Grant	Grant	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Hubbard	Hubbard	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Isanti	Isanti	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Itasca	Itasca	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Kanabec	Kanabec	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Kittson	Kittson	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Koochiching	Koochiching	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Lake of the Woods	Lake of the Woods	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Mahnomen	Mahnomen	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Marshall	Marshall	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Mille Lacs	Mille Lacs	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Morrison	Morrison	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Norman	Norman	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Otter Tail	Otter Tail	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Pennington	Pennington	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Pine	Pine	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Pope	Pope	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Red Lake	Red Lake	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Roseau	Roseau	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Stevens	Stevens	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Swift	Swift	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Todd	Todd	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Traverse	Traverse	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Wadena	Wadena	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	Wilken	Wilken	2/1/01	Yes		System installed, deployment in progress	Jun-03
MN	St. Louis	St. Louis	2/2/01	Yes		System Installation Underway	Jul-03
MN	Clay	Clay	2/3/01	Yes		System Installation Underway	Jul-03

State	Requesting Entity Name	PSAP	Date requested	Date E911		Reason if not	Projected Deployment Date
				Valid PSAP Request	Phase II Active		
MN	Polk	Polk	2/4/01	Yes		System Installation Underway	Jul-03
MN	Stearns	Stearns	2/5/01	Yes		System Installation Delayed	Dec-03
MS	Tunica		No Phase 2 requests in MS				
MS	Tate		No Phase 2 requests in MS				
MS	Marshall		No Phase 2 requests in MS				
MS	Coahoma		No Phase 2 requests in MS				
MS	Quitman		No Phase 2 requests in MS				
MS	Panola		No Phase 2 requests in MS				
MS	Lafayette		No Phase 2 requests in MS				
MS	Bolivar		No Phase 2 requests in MS				
MS	Sunflower		No Phase 2 requests in MS				
MS	Tallahatchie		No Phase 2 requests in MS				
MS	Leflore		No Phase 2 requests in MS				
MS	Carroll		No Phase 2 requests in MS				
MS	Holmes		No Phase 2 requests in MS				
MS	Yalobusha		No Phase 2 requests in MS				
MS	Grenada		No Phase 2 requests in MS				
MS	Calhoun		No Phase 2 requests in MS				
MS	Chickasaw		No Phase 2 requests in MS				
MS	Monroe		No Phase 2 requests in MS				
MS	Clay		No Phase 2 requests in MS				
ND	Cass		No Phase 2 requests in ND				
ND	Traill		No Phase 2 requests in ND				
ND	Grand Forks		No Phase 2 requests in ND				
NH	Cheshire		No Phase 2 requests in NH				
NH	Coos		No Phase 2 requests in NH				
NH	Grafton		No Phase 2 requests in NH				
NH	Hillsborough		No Phase 2 requests in NH				
NH	Strafford		No Phase 2 requests in NH				
NH	Sullivan		No Phase 2 requests in NH				
NY	Clinton		No Phase 2 requests in NY				
NY	Essex		No Phase 2 requests in NY				
NY	Franklin		No Phase 2 requests in NY				
NY	Fulton		No Phase 2 requests in NY				
NY	Hamilton		No Phase 2 requests in NY				
OR	Baker Co SO		No Phase 2 requests in OR				
OR	Benton		No Phase 2 requests in OR				
OR	Corvallis Regional Comm Ctr - Benton Co		No Phase 2 requests in OR				
OR	Crook		No Phase 2 requests in OR				

State	Requesting Entity Name	PSAP	Date requested	Valid PSAP Request	Date E911 Phase II Active	Reason if not	Projected Deployment Date
OR	Deschutes		No Phase 2 requests in OR				
OR	Grant		No Phase 2 requests in OR				
OR	Harney		No Phase 2 requests in OR				
OR	Henniston PD		No Phase 2 requests in OR				
OR	Klamath		No Phase 2 requests in OR				
OR	Lake		No Phase 2 requests in OR				
OR	Lincoln		No Phase 2 requests in OR				
OR	Linn County Sheriff's Office		No Phase 2 requests in OR				
OR	Malheur		No Phase 2 requests in OR				
OR	Toledo PD		No Phase 2 requests in OR				
OR	Umatilla Co SO		No Phase 2 requests in OR				
OR	Union		No Phase 2 requests in OR				
OR	Walowa		No Phase 2 requests in OR				
SD	Clark		No Phase 2 requests in SD				
SD	Codington		No Phase 2 requests in SD				
SD	Day		No Phase 2 requests in SD				
SD	Deuel		No Phase 2 requests in SD				
SD	Grant		No Phase 2 requests in SD				
SD	Hamlin		No Phase 2 requests in SD				
SD	Lincoln		No Phase 2 requests in SD				
SD	Marshall		No Phase 2 requests in SD				
SD	Minnehaha		No Phase 2 requests in SD				
SD	Roberts		No Phase 2 requests in SD				
VT	Vermont State Enhanced 911 Board	Vermont State E911 System		Yes		System installed deployment in progress	05/15/03
WA	Asotin		No Phase 2 requests in WA				
WA	Chelan		No Phase 2 requests in WA				
WA	Columbia		No Phase 2 requests in WA				
WA	Douglas		No Phase 2 requests in WA				
WA	Ferry		No Phase 2 requests in WA				
WA	Garfield		No Phase 2 requests in WA				
WA	Okanogan		No Phase 2 requests in WA				
WA	Pend Oreille		No Phase 2 requests in WA				
WA	Stevens		No Phase 2 requests in WA				
WA	Walla Walla		No Phase 2 requests in WA				
WA	Whitman		No Phase 2 requests in WA				
WI	Douglas County		No Phase 2 requests in WI				

# A F F I D A V I T

County of Douglas

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State of Minnesota

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I, SCOTT DONLEA, having been first duly sworn, depose and state as follows:

1. I am Vice President – Market Development for Rural Cellular Corporation.
2. I am familiar with the facts contained in the foregoing Quarterly Report of Phase-In of E911 Phase II Compliance, and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

Scott Donlea

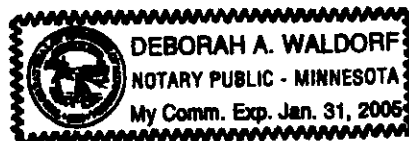
Scott Donlea

Vice President – Market Development  
Rural Cellular Corporation

Subscribed to and sworn to before me  
this 28<sup>th</sup> day of April, 2003.

Deborah A. Waldorf  
Notary Public

My commission expires:





**CERTIFICATE OF SERVICE**

I, Loren Costantino, an employee in the law offices of Lukas, Nace Gutierrez & Sachs, Chartered, do hereby certify that I have on this 1st day of May, 2003, sent by U.S. Mail, a copy of the foregoing E911 Quarterly Report of Rural Cellular Corporation (for itself and its affiliates) to the following:

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Washington, DC 20554

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Loren Costantino

\*By Hand-Delivery